UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK WARD MEDIA, INC.,

Plaintiff,

- against -

07 CV. 5470 (BSJ)

RULE 26 DISCLOSURE

CREOSCOPE MEDIA, INC. and FRISCHMAN ENTERPRISES, INC. d/b/a PCSECURITYSHIELD,

Defendants.

Defendant FRISCHMAN ENTERPRISES, INC. d/b/a PCSECURITYSHIELD, by its attorneys, SOMER & HELLER LLP, as and for their Federal Rule of Civil Procedure 26(a) disclosure, respectfully alleges as follows:

A.(I) Arthur Frischman President - PCSecurityShield 601 N. Congress Avenue Suite 303 Delray Beach, Florida 33445 (561)243-3248 ext 224

> Subject: Information concerning Frischman Enterprises, Inc.'s loan to Creoscope Media, Inc. and information concerning his ownership in and the management and operations of Creoscope Media, Inc.

(ii) Ilona Buksbaum Bookkeeper - PCSecurityShield 601 N. Congress Avenue Suite 303 Delray Beach, Florida 33445 (561)243 - 3248

> Subject: Information concerning the books and records of Frischman Enterprises, Inc. d/b/a PCSecurityShield, information regarding accounting and bookkeeping of Creoscope Media, Inc.

Subject: Information concerning the books and records of Creoscope Media, Inc. and information concerning Creoscope Media, Inc's agreement with Ward Media, Inc.

(iv) Craig McGuinn
Ward Media Inc.
141 W. 35<sup>th</sup> Street, 20<sup>th</sup> Floor
New York, New York 10018
(212) 967-5055

Subject: Information concerning the books and records of Ward Media, Inc. and information concerning Ward Media, Inc's agreement with Creoscope Media, Inc.

- B. Documents in the custody and control of Arthur Frischman includes e-mails concerning Creoscope Media, Inc.'s debts to Ward Media, Inc. and Frischman Enterprises, Inc.'s corporate documents reflecting investments loan(s) in and to Creoscope Media, Inc. These documents are located at Mr. Frischman's office for conduct of business at Frischman Enterprises, Inc., 601 N. Congress Avenue, Suite 303, Delray Beach, Florida 3345. Such documents will be made available for inspection and copying or will be provided by Mr. Frischman and/or Frischman Enterprises, Inc. d/b/a PCSecurityshield.
  - C. N/A.
  - D. N/A.

Frischman Enterprises, Inc. d/b/a PCSecurityshield reserves the right to supplement the foregoing responses.

Dated: Commack, New York September 7, 2007

Your, etc.

SOMER & HELLER LLP

Bv.

Jeffrey T. Heller (JTH-2720)

Attorneys for Defendant

FRISCHMAN ENTERPRISES, INC. d/b/a

PCSECURITYSHIELD

2171 Jericho Turnpike Commack, New York 11725

631-462-2323

TO: FRANKFURT KURNIT KLEIN & SELZ, P.C. Attorneys for Plaintiff
488 Madison Avenue
New York, New York 10022
(212) 980-0120

CREOSCOPE MEDIA, INC. 1300 NW 17<sup>th</sup> Ave, Suite 260 Delray Beach, FL 33445